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May 24 2021

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

ON CERTIORARI TO THE SOUTH CAROLINA COURT OF APPEALS
Appeal from Spartanburg County
Circuit Court

J. Mark Hayes, II
Circuit Court Judge

Supreme Court Case No.: 2020-001184

State of South CarolinaPetitioner,

v.

Kenneth Taylor Respondent.

AFFIDAVIT OF JASON SCOTT LUCK

My name is Jason Scott Luck. I am 43 years of age and competent to execute this affidavit, which I make based on my personal experience and observation, except for statements made upon information and belief, which I believe to be true.

I seek to be appointed as guardian *ad litem* (or, alternatively, whatever role this Court deems appropriate) to protect the rights of Respondent Kenneth Taylor. Mr. Taylor has been unrepresented during the appellate process in the Court of Appeals and this Court. Further, it appears from the affidavit of Zachary Ellis and the record of this case (*e.g.*, returned mail) Mr. Taylor has not received notice of the proceedings before the Court of Appeals and this Court. In order to protect Mr. Taylor's right to due process of law, he must have representation before this tribunal.

JSL

I believe that I have the experience to adequately protect Mr. Taylor's liberty in this matter. I have appeared personally before this Court, the Court of Appeals, and the Fourth Circuit Court of Appeals in multiple appeals. I have also appeared (albeit via pleading only) before the United States Supreme Court three times. Roughly half of my appellate experience has been in criminal matters, and the majority of my recent appeals have been in criminal or habeas corpus cases. I have attached a recent resume to this affidavit as Exhibit A.

I have attempted to reach Mr. Taylor via multiple telephone numbers attributed to him. I have also called multiple alleged relatives and/or associates of Mr. Taylor and have been unable to reach him. The LexisNexis report I have on Mr. Taylor does not even provide a potential address for him after 2017. I have also been unable to locate him on social media.

I agree to represent Mr. Taylor pro bono and appear at my own cost at any oral arguments, if this Court deems them necessary. I do beg this Court, however, to waive any filing fees for the motions that accompany this affidavit.

Further affiant sayeth naught.



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SWORN TO AND SUBSCRIBED BEFORE ME

This 24th Day of May, 2021

Wanda F. Davis (SEAL)

PRINT NAME: Wanda F. Davis

NOTARY PUBLIC FOR: South Carolina

My Commission Expires: 11-25-2030

